

Koch, Kristine

From: Koch, Kristine
Sent: Wednesday, July 29, 2015 3:31 PM
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Cc: Silvina Fonseca (Fonseca.Silvina@epa.gov); Legare, Amy; Steve Ells (Ells.Steve@epa.gov); Charters, David; Cora, Lori
Subject: FW: Portland Harbor Draft Final FS Section 3 and updates to Section 2
Attachments: 2015-07-29 Attachment B1 Hardness-based Mn Criterion Memo_FINAL_25 November 2014.pdf; 2015-07-29 Portland Harbor Draft Final Figure 2.2-2 PRG & river bank-Footprints.pdf; 2015-07-29 Portland Harbor Draft Final FS Section 2.2 Tables.xlsx; 2015-07-29 Portland Harbor Draft Final FS Section 2.docx; 2015-07-29 Portland Harbor Draft Final Table 2.4-02 Technology Process Option ScreeningTable.xlsx; 2015-07-29 Portland Harbor Draft Final Tables 2 1-1 through 2 1-3 ARARs.xlsx

Included in this email is [Section 3 of the Portland Harbor Draft Final FS and updates to Section 2](#) for your review and comment per the Portland Harbor MOU. This has also been provided to the LWG for their review and comment.

Due to the heightened interest in this project, parties beyond the LWG, MOU partners and CAG may receive copies of the transmitted information. Therefore, the following provides an update of where we are in the process and steps we expect to occur over the next several months. If any party requests a copy of this information, please provide a copy of this email, too.

EPA is transmitting Section 3 of the Portland Harbor Draft Final Feasibility Study and updates to Section 2 for review and comment to the Lower Willamette Group (LWG), the Oregon Department of Environmental Quality (ODEQ), six federally recognized tribal governments, other federal and state partners, and the Community Advisory Group (CAG). These parties are receiving these documents because they have been working with EPA under special agreements in developing the Remedial Investigation and Feasibility Study for the Portland Harbor Superfund Site.

Section 3 presents seven different cleanup alternatives that EPA is evaluating to address risks posed by the contamination at the site. The “no action” alternative is presented as Alternative A, and the other six alternatives, Alternative B through G, all use the same combination of technologies to differing degrees. The combined technologies include dredging, capping, in-situ treatment, ex-situ treatment, enhanced monitored

natural recovery, monitored natural recovery, and institutional controls. Other information provided in this section includes:

- Developing alternatives that include sediments and riverbanks contaminated with 23 contaminants of concern
- Defining and addressing Principal Threat Waste (PTW) – including pure chemical product seeping from the sediments within the Site, as well as highly contaminated sediments
- Removal, treatment, and appropriate disposal of NAPL and PTW material that cannot be reliably contained
- Addressing contaminated groundwater seeping into the river
- Cleanup of Swan Island Lagoon.

EPA is working to address concerns that have been raised both regionally and nationally regarding how it addresses sediment sites. The EPA draft FS is responsive to many of the concerns in the following specific ways:

- Regional and Headquarters staff and management are working together to ensure the FS complies with CERCLA, the NCP, EPA policy and guidance. The Headquarters team has experience with sediment sites nationwide. Therefore, lessons learned at other sites including sediment sites, are used to inform decision-making at Portland Harbor.
- EPA is including an appropriate range of technologies to address contaminated sediment such as dredging, capping, enhanced monitored natural recovery, monitored natural recovery, ex-situ treatment, in-situ treatment and institutional controls.
- EPA has evaluated and is including natural recovery in all cleanup alternatives.
- EPA's evaluation of remedial alternatives is focused on risk reduction with achievable cleanup goals over the long term.
- When developing the alternatives, EPA will consider the environmental conditions of the river (erosional, transitional or depositional) the current and potential future uses (industrial, recreational, etc.) and will seek to limit the use restrictions. For example:
 - EPA will consider limiting the use of caps in locations where commercial and shipping activities occur.
 - EPA will also consider future navigation and maintenance dredging when determining the appropriate cleanup technology.
 - Appropriate beach material will be placed in sediment cleanup locations that serve as public access points for recreation or wildlife habitat.

Next Steps

- EPA will be releasing Section 4 of the Draft Final Feasibility Study on August 7, 2015.
- Internal EPA meeting with the National Remedy Review Board (NRRB) and the Contaminated Sediment Technical Advisory Group (CSTAG) is scheduled for November 18 and 19 in Portland, Oregon. EPA policy requires a conceptual remedy to be presented to the NRRB and the CSTAG for internal review prior to issuing the Proposed Plan for sites where cleanup will cost more than \$50 million. The Portland Harbor cleanup will require this review. The NRRB and CSTAG review conceptual remedies to ensure national consistency with CERCLA, the NCP, and EPA policies and guidances. Both groups also take into consideration past practice at sites similar magnitude and provide advisory recommendations for the concept remedy. The EPA Portland Harbor team will use the advisory recommendations from the NRRB and CSTAG in developing the Proposed Plan. The LWG, ODEQ, six federally recognized tribal governments, and CAG can provide input to the NRRB and CSTAG on the concept remedy. To facilitate their ability to provide input, EPA will share the concept remedy with these parties on September 18, 2015.
- EPA expects to release a proposed cleanup plan for public review and comment in the spring of 2016. EPA has several internal steps to complete before releasing the Proposed Plan.

Thank you for your continuing involvement in the Portland Harbor cleanup.

Sincerely,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: Koch, Kristine
Sent: Wednesday, July 29, 2015 3:29 PM
To: Bob Wyatt (rjw@nwnatural.com); Jim McKenna (jim.mckenna@verdantllc.com)
Cc: Jen Woronets
Subject: Portland Harbor Draft Final FS Section 3 and updates to Section 2

Jim and Bob – EPA’s draft modifications to the 2011 Draft FS submitted by the LWG regarding development and screening of the alternatives is provided in the FTP link, below. This information has been combined into a new Section 3 and Appendices C, D and E for the draft Final FS. Per the agreed process between the LWG and EPA, the LWG has 15 days to identify significant issues and 30 days to review and provide comments to EPA from the time they receive FS Section 4. Therefore, the LWG is to identify significant issues by August 28, 2015, and provide comments to EPA by September 8, 2015. Additionally, if you have any technical issues that you would like to discuss in this time frame, please contact me. We already have three technical sessions scheduled on August 11, 13 and 27. Further, per the agreed process, any issues raised during the 30-day review period are to be resolved within the subsequent 14-day period.

In addition, I am providing updated information for FS Section 2. As we indicated, we have been making modifications to the ARARs table. Attached is the latest version of that table. Additionally, the national AWQCs for human health have been finalized, so the attached PRG tables have been updated to reflect those numbers. We have also updated Figure 2.2-2 and some text in Section 2, which are also attached.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: Jones, Jennifer M. via CDM Smith Files Notification Service [<mailto:NoReply@files.cdmsmith.com>]
Sent: Wednesday, July 29, 2015 12:02 PM

To: Koch, Kristine

Subject: New Package Notification



New Package Notification

A package has been posted for you.

From: Jones, Jennifer M.

Subject: Section 3- all files

Please use the following URL to view this package over a secure connection. After viewing this package, you may also download any associated attachments or compose a reply using your favorite web browser.

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Regards,
CDM Smith Files Notification Service